

PP:LAB/LM/ML

F.# 2018R00550/OCDETF# NY-NYE-875

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

I N D I C T M E N T

- against -

Cr. No. _____

ALEX LEVIN,

(T. 18, U.S.C., §§ 371, 1956(h) and
3551 et seq.)

Defendant.

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THE GRAND JURY CHARGES:

COUNT ONE

(Money Laundering Conspiracy)

1. In or about and between March 2015 and October 2019, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ALEX LEVIN, together with others, did knowingly and intentionally conspire: to conduct financial transactions affecting interstate and foreign commerce, which in fact involved the proceeds of specified unlawful activity, to wit: offenses against one or more foreign nations involving fraud, and one or more schemes and attempts to defraud, by and against one or more foreign banks, in violation of the laws of the Ukraine, Russia, North Macedonia, Moldova, Latvia, Uzbekistan, Azerbaijan and France, as defined in Title 18, United States Code, Section 1956(c)(7)(B)(iii) (the "Specified Unlawful Activity"), knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, to engage in monetary transactions in and affecting interstate and foreign commerce in criminally derived property of a value greater than \$10,000 that was

derived from specified unlawful activity, to wit: the Specified Unlawful Activity, contrary to Title 18, United States Code, Section 1957(a).

(Title 18, United States Code, Sections 1956(h) and 3551 et seq.)

COUNT TWO

(Conspiracy to Violate the Travel Act)

2. In or about and between March 2015 and October 2019, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ALEX LEVIN, together with others, did knowingly and intentionally conspire to travel in interstate and foreign commerce and to use one or more facilities in interstate and foreign commerce, to wit: cellular telephones, with intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of an unlawful activity, to wit: the crime charged in Count One, and thereafter did perform and attempt to perform such promotion, management, establishment, carrying on and facilitation of the promotion, management, establishment and carrying on of such unlawful activity, contrary to Title 18, United States Code, Section 1952(a)(3)(A).

3. In furtherance of the conspiracy and to effect its objects, within the Eastern District of New York and elsewhere, the defendant LEVIN, together with others, did commit and cause the commission of, among others, the following:

OVERT ACTS

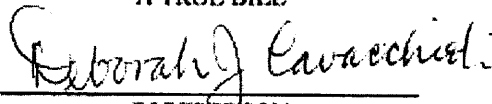
- (a) On or about October 21, 2015, LEVIN purchased camera equipment, which was paid for by one of Val Cooper's, also known as "Val Konon" and "Valeriy Kononenko," companies;
- (b) On or about July 11, 2017, Cooper sent an electronic message to LEVIN containing a photograph of a safe deposit box lock for sale;
- (c) On or about December 31, 2017, Ninel Kononenko used a credit card (the "Credit Card") to purchase airline tickets for Garri Smith, also known as Igor Berk or Igor Berkovich, to fly on January 1, 2018 from John F. Kennedy International Airport in Queens, New York ("JFK") to Riga, Latvia;
- (d) On or about January 1, 2018, Ninel Kononenko used the Credit Card to pay for a hotel room for Smith to stay in Riga, Latvia;
- (e) On or about January 4, 2018, Smith entered a bank in Riga, Latvia (the "Latvian Bank") and used duplicate keys to open and inspect other persons' safe deposit boxes;
- (f) On or about January 6, 2018, Ninel Kononenko used the Credit Card to purchase airline tickets for Cooper to fly on January 12, 2018 from JFK to Riga, Latvia;
- (g) On or about January 8, 2018, Ninel Kononenko used the Credit Card to pay for a hotel room for Cooper to stay at a hotel in Riga, Latvia (the "Hotel");
- (h) On or about January 15, 2018, Smith, together with others, stole property from safe deposit boxes at the Latvian Bank;

(i) On or about January 15, 2018, Cooper met with co-conspirators at the Hotel to, among other things, divide proceeds from the theft from the Latvian Bank; and


(j) On or about January 15, 2018, Smith flew from Warsaw, Poland to JFK.

(Title 18, United States Code, Sections 371 and 3551 et seq.)

A TRUE BILL



FOREPERSON



MARK J. LESKO
ACTING UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK